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October 14, 2019

## VIA CM/ECF and Email

Hon. Andrew L. Carter, Jr. U.S. District Court for the Southern District of New York 40 Foley Square New York NY 10007

Re: Consent Motion for Extension of Time in *Moore, et al v. Cohen, et al.*, 1:19-cv-4977

Dear Judge Carter,

We represent Plaintiffs Roy Moore and Kayla Moore ("Plaintiffs") in this case. Pursuant to Rule 1(D) of this Court's Individual Practices, Plaintiffs move for a 14-day extension of time, until and including October 29, 2019 to file a response to Defendants' Motion to Dismiss. The original due date for this response is October 15, 2019, and no previous requests for extension have been made by Plaintiffs.

Counsel for Defendants have consented to Plaintiffs' motion on the condition that they also be granted an extension of time until and including November 19, 2019 to file any reply. Plaintiffs consent to this as well.

Respectfully Submitted,

/s/ Larry Klayman\_\_\_\_ Klayman Law Group P.A. 2020 Pennsylvania Ave NW #800 Washington, DC, 20006

Attorney for Plaintiffs Pro Hac Vice

Cc: Defendant's counsel (via CM/ECF and email)

SO ORDERED:

HON. ANDREW L. CARTER, JR. UNITED STATES DISTRICT JUDGE

10/15/19